

AO 91 (Rev. 11/11) Criminal Complaint

AUSA KELLEY

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

FILED  
RICHARD W. NAGEI  
CLERK OF COURT

2020 JUN 30 PM 4:00

United States of America

v.

Randy G KAIGLER

Case No.

2:20-mj-457

U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
EAST. DIV. COLUMBUS

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 25, 2020 in the county of Franklin in the  
Southern District of Ohio, the defendant(s) violated:

Code Section

18 USC 922(g)(1)  
18 USC 922(g)(9)

Offense Description

Knowingly Possess a Firearm by a Convicted Felon  
Knowingly Possess a Firearm after a Domestic Violence Conviction

This criminal complaint is based on these facts:

SEE ATTACHED

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date:

6-30-20

City and state:

Columbus Ohio

Complainant's signature

Printed name and title

Judge's signature

US Magistrate Judge

Printed name and title

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**PROBABLE CAUSE AFFIDAVIT****Randy G. KAIGLER**

I, Samuel Chappell, being duly sworn, depose and state that:

1. I have been an Officer with the Columbus Division of Police since 2007. I have been assigned to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) as a Task Force Officer (TFO) since 2017. As a result of my training and experience, I am familiar with state and federal laws pertaining to firearms and narcotics violations, among other offenses.
2. On or about August 31, 2011 Randy G KAIGLER (hereinafter KAIGLER) was sentenced for one count of Domestic Violence, (criminal Case Number 2011 CRB00675), in the Girard Ohio Municipal Court.
3. On or about January 20, 2017, KAIGLER was sentenced for one count of False Report, a felony that can carry a prison term of more than a year in prison (criminal Case Number 18348), in the Bedford County, Tennessee Circuit Court.
4. On or about June 25, 2020 at approximately 11:30 PM a Columbus Division of Police (CPD) was working remote surveillance in the Emergency Operations Center monitoring the area of S Front St and W Broad St when he observed an individual later identified as KAIGLER carrying a handgun on his right hip in a holster outside his pants. KAIGLER was approaching approach a parked green 2002 Honda motorcycle with OH Tag# 4E3154. A CPD officer checked the vehicle's registration and learned that KAIGLER was the registered owner and did not have a motorcycle endorsement on his license, and a review of his CCH showed a conviction for Domestic Violence. Marked police cruisers in the area affect a traffic stop on KAIGLER.at 333 W Town St. KAIGLER was taken into custody without incident.
5. Once KAIGLER was in custody, CPD Officers recovered a loaded Smith & Wesson 40VE, loaded with 13 live rounds and 1 in the chamber from the holster on KAIGLER's right hip. KAIGLER was transported to CPD Headquarters then to Franklin County Jail for slating.
6. It was determined that the aforementioned firearm seized from KAIGLER on or about June 25, 2020 was NOT manufactured in the State of Ohio and therefore travelled in interstate commerce to reach the State of Ohio.
7. The aforementioned offenses occurred in Franklin County, Ohio, in the Southern Judicial District of Ohio.
8. Based on this information, your affiant believes probable cause exists that KAIGLER possessed a firearm after having been convicted of a crime punishable by more than one-year incarceration, in violation of 18 U.S.C. 922(g)(1).
9. Based on this information, your affiant believes probable cause exists that KAIGLER possessed a firearm after having been convicted of a crime of domestic violence, in violation of 18 U.S.C. 922(g)(9).

**PROBABLE CAUSE AFFIDAVIT**  
**Randy G. KAIGLER**

  
\_\_\_\_\_  
ATF TFO Samuel Chappell

Sworn to and subscribed before me this day of 30<sup>th</sup> June 2020 at 7:26 p.m. Columbus,  
Ohio.

  
\_\_\_\_\_  
U.S. MAGISTRATE JUDGE

